



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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ATLANTA, GEORGIA 30303-8960

October 15, 2007

Glenn Bowman
State Environment/Location Engineer
Georgia Department of Transportation
3993 Aviation Circle
Atlanta, Georgia 30336

SUBJECT: Final Supplemental Environmental Impact Statement for U.S. 411 Connector
from U.S. 411/U.S. 41 Interchange to U.S. 411/I-75 Interchange in Bartow County,
Georgia; CEQ Number 20070384

Dear Mr. Bowman:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Supplemental Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Georgia Department of Transportation (GDOT) and the Federal Highway Administration (FHWA) propose to complete the U.S. 411 Connector project to improve the connection of the U.S. 411/S.R. 20 corridor to the interstate system by providing a more direct link between I-75 and U.S. 411 at its interchange with U.S. 41/S.R. 3 west of Cartersville in Bartow County, Georgia.

Seven alternatives were considered in detail, including five build alternatives, a transportation system management alternative, and the No Action alternative. Alternative D-Avoidance/Minimization was determined to be the preferred alternative. This alternative consists of a four-lane divided, limited access facility on primarily new alignment approximately 9.5 miles in length, with three interchanges.

During review of the Draft Supplemental EIS, EPA expressed concerns related to the potential for negative direct and indirect impacts to water quality and sensitive aquatic species in the Etowah River watershed. EPA promoted stormwater design and construction methods that incorporated elements of the Etowah Habitat Conservation Plan (HCP) into this project. A number of mitigation measures are described in the Final Supplemental EIS, including a commitment to meet the Etowah HCP stormwater run-off standards. In general, EPA supports this approach as well as many of the other measures proposed to mitigate for adverse project impacts to wetlands, streams, and water quality. These other measures include bridging of the majority of streams in the project area; removal of existing culverts at two locations and replacement with bottomless culverts; and extensive post-construction stormwater management. These roadway best management practices will include design of bridges to keep stormwater runoff from entering streams directly, and use of enhanced swales, stormwater ponds, and

sediment basins to capture and treat post-construction stormwater runoff. With regard to stream and wetland impacts, EPA continues to promote appropriate functional replacement for those wetland and stream functions impacted by the project. This could involve on-site mitigation as close to the impact site as possible, off-site mitigation within the watershed, or a combination of both. Mitigation should include restoration, enhancement or preservation of wetlands and stream reaches that have been degraded or other watershed improvements.

EPA appreciates inclusion of the updated noise modeling and mitigation information in the Final Supplemental EIS in response to our comments. EPA supports GDOT's decision to construct two noise barriers that would serve to mitigate noise impacts to 47 out of the 64 noise-impacted receptors in the project area. EPA recommends that GDOT coordinate with the affected communities where these noise walls are planned during final design to discuss additional potential visual and aesthetic mitigation measures, as appropriate.

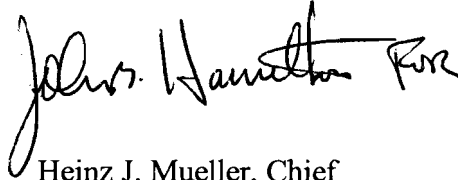
EPA appreciates inclusion of the additional information related to regional and project-level air quality conformity requirements in the Final Supplemental EIS in response to our comments. The Atlanta Regional Commission has recently adopted an updated long-range transportation plan (Envision 6) for the Atlanta metropolitan region. EPA recommends that GDOT and FHWA confirm prior to the approval of the Record of Decision (ROD) that the preferred alternative, as described in the Final Supplemental EIS, is included in the most recent ozone and PM 2.5 conformity determinations for this plan.

The Final Supplemental EIS also included a basic analysis of the likely mobile source air toxics (MSAT) emission impacts of the project. This analysis generally follows the February 2006 FHWA MSAT interim guidance which describes how to assess MSAT impacts for transportation projects during the NEPA process. While there are positive elements to this guidance, especially the willingness to acknowledge potential MSAT concerns, EPA continues to disagree with major elements of this approach nationally. EPA does not agree with the statement that, "...available technical tools do not enable us to predict the project-specific health impacts of the emission changes associated with the alternatives in this Final Supplemental EIS." There are a number of available technical tools that allow for comparisons among alternatives of the location-specific project-level risk estimates of mobile source air toxics. In addition, there are several references in this section that are out of date. For example, the Final Supplemental EIS does not accurately cite and summarize EPA's latest MSAT rule, published on February 26, 2007. EPA recommends that GDOT and FHWA coordinate with EPA on future projects of this magnitude to ensure appropriate technical tools and assessment methodologies are utilized in the analysis of MSATs.

EPA continues to have concerns that the preferred alternative has the greatest impacts to jurisdictional wetlands, regulatory floodplains, loss of upland forest habitat, and is predicted to add the most acres of impervious surfaces due to induced future growth. However, EPA supports the mitigation measures and monitoring programs as described in the Final Supplemental EIS. EPA recommends strict adherence to these best management practices to protect water quality and aquatic habitat. EPA also recommends inclusion of these mitigation commitments in the ROD for the project.

We appreciate the opportunity to review the proposed action. Please contact Ben West at (404) 562-9643 if you want to discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Federal Highway Administration – Georgia Division